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Attorneys for Defendant Richard Marchitto

Our File No.: 23844

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Return Date: April 19, 2021

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**U.S. SECURITIES AND
EXCHANGE COMMISSION,**

Plaintiff,

v.

**VUUZLE MEDIA CORP., RONALD
SHANE FLYNN, and RICHARD
MARCHITTO,**

Defendants.

Case No. 2:21-cv-01226 (KSH-CLW)

CIVIL ACTION

**NOTICE OF MOTION
TO DISMISS PLAINTIFF'S
COMPLAINT AS TO DEFENDANT
RICHARD MARCHITTO**

TO: Daniel J. Maher, Esq.
Devon Staren, Esq.
Attorneys for Plaintiff
U.S. Securities and Exchange Commission
100 F Street NE
Washington, DC 20549
Attorneys for Plaintiff

Melissa Ann Alcantara, Esq.
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Washington, DC 20006
Attorney for Defendant Vuuzle Media Corp.

PLEASE TAKE NOTICE that on April 19, 2021 at 9:00 o'clock in the forenoon, or as soon thereafter as counsel can be heard, the undersigned, attorneys for defendant Richard Marchitto, shall move this Court for an Order granting his motion to dismiss plaintiff's Complaint as to defendant Marchitto.

PLEASE TAKE FURTHER NOTICE that in support of this motion, defendant Marchitto shall rely on the accompanying Brief.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is enclosed herewith and that oral argument is requested.

WEINER LAW GROUP LLP

Attorneys for Defendant,

Richard Marchitto

By: s/ Jay V. Surgent
Jay V. Surgent

Dated: March 24, 2021